



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUL 15 2015

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7648 7283
RETURN RECEIPT REQUESTED

Mr. James Emch
Environmental, Health & Safety Team Lead
BASF Corporation
2525 South Kensington Road
Kankakee, Illinois 60901

Re: Notice of Violation
Compliance Evaluation Inspection
ILD 005 215 769

Dear Mr. Emch:

On August 28, 2014 a representative of the U.S. Environmental Protection Agency inspected the BASF Corporation facility (BASF) located in Kankakee, Illinois. As a large quantity generator of hazardous waste, BASF is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate BASF's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by BASF, EPA's review of records pertaining to BASF, and the inspector's observations, EPA has determined that BASF has unlawfully stored hazardous waste without a permit or interim status as a result of BASF's failure to comply with certain conditions for a permit exemption under Ill. Admin. Code tit. 35 § 722.134(a)-(c) [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the permit exemption conditions with which BASF was out of compliance at the time of the inspection in paragraphs 1-3, below.

At the time of the inspection, BASF was out of compliance with the following large quantity generator permit exemption conditions:

STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS

1. Date When Each Period of Accumulation Begins

Under Ill. Admin. Code tit. 35 § 722.134(a)(2) [40 C.F.R. § 262.34(a)(2)], a large quantity generator must clearly mark each container holding hazardous waste with the date upon which each period of accumulation begins.

At the time of the inspection, BASF was accumulating one container of hazardous waste without the accumulation start date.

2. Hazardous Waste Container Labeling

Under Ill. Admin. Code tit. 35 § 722.134(a)(3) [40 C.F.R. § 262.34(a)(3)], a large quantity generator must label or clearly mark each container holding hazardous waste with the words "Hazardous Waste."

At the time of the inspection, BASF was accumulating one container of hazardous waste without the words "Hazardous Waste."

Many of the conditions for a RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its permit exemption due to a failure to comply with an exemption condition incorporated from Ill. Admin. Code tit. 35 Part 725, the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirement. The exemption condition identified in paragraph 3 is also an independent TSD requirement incorporated from Ill. Admin. Code tit. 35 Part 725. Accordingly, each failure of BASF to comply with this condition is also a violation of the corresponding requirement in Ill. Admin. Code tit. 35 Part 725 [40 C.F.R. Part 265].

STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS AND VIOLATIONS OF TSD REQUIREMENTS

3. Contingency Plan

A large quantity generator of hazardous waste must have a contingency plan that is designed to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water. *See* Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.151(a) [40 C.F.R. §§ 262.34(a)(4) and 265.51(a)]. A large quantity generator must have a contingency plan which describes arrangements agreed to by local police departments, fire departments, hospitals, contractors and State and local emergency response teams to coordinate emergency services. *See* Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.152(c) [40 C.F.R. §§ 262.34(a)(4) and 265.52(c)]. A large quantity generator must submit a copy of their contingency plan to all local police

departments, fire departments, hospitals, contractors and State and local emergency response teams that may be called upon to provide emergency services. *See* Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.153(b) [40 C.F.R. §§ 262.34(a)(4) and 265.53(b)].

At the time of the inspection, BASF did not have a contingency plan that described arrangements agreed to by local police departments, fire departments, hospitals, contractors and State and local emergency response teams to coordinate emergency services.

At the time of the inspection, BASF did not have a record that it had submitted their contingency plan to the local police department, fire department, hospital and State and local emergency response teams that would provide emergency services to the facility or their employees.

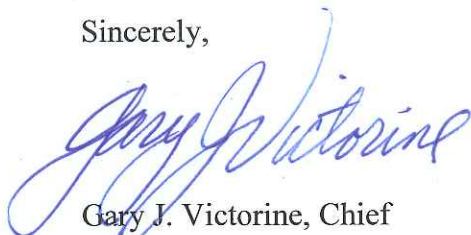
By failing to comply with the conditions for a permit exemption, above, BASF became an operator of a hazardous waste storage facility, and was required to obtain an Illinois hazardous waste storage permit. BASF failed to apply for such a permit. BASF's failure to apply for and obtain a hazardous waste storage permit violated the requirements of Ill. Admin. Code tit. 35 §§ 703.121(a) and (b); 703.180(c); and 705.121(a) [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a permit exemption condition incorporated from Ill. Admin. Code tit. 35 Part 725 [40 C.F.R. Part 265] is also an independent violation of the corresponding TSD requirement.

At this time, EPA is not requiring BASF to apply for an Illinois hazardous waste storage permit so long as it immediately establishes compliance with the conditions for a permit exemption outlined in paragraphs 1-3, above.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above condition. You should submit your response to Graciela Scambiaterra, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Ms. Graciela Scambiaterra, of my staff, at 312-353-5103 or at scambiaterra.graciela@epa.gov.

Sincerely,



Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Todd Marvel, Illinois Environmental Protection Agency (todd.marvel@illinois.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
LAND AND CHEMICALS DIVISION, RCRA BRANCH
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME: BASF Corporation

EPA ID No.: ILD 005 215 769


LOCATION ADDRESS: 2525 South Kensington Road
Kankakee, Illinois 60901

NAICS CODE(s): 325199 [All Other Basic Organic Chemical Manufacturing]
325211 [Plastics Material and Resin Manufacturing]
325411 [Medicinal and Botanical Manufacturing]
325613 [Surface Active Agent Manufacturing]

DATE OF INSPECTION: August 28, 2014

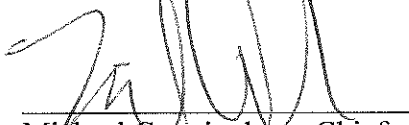
U.S. EPA INSPECTOR(s): Graciela Scambiaterra

PREPARED BY:


Graciela Scambiaterra
Environmental Scientist

6/26/2015
Date

APPROVED BY:


Michael Cunningham, Chief
Compliance Section 1
RCRA Branch
Land and Chemicals Division

6/23/15
Date

RCRA Compliance Evaluation Inspection

Introduction

I, Graciela Scambiaterra, Environmental Scientist, from the United States Environmental Protection Agency (EPA) conducted a hazardous waste compliance evaluation inspection (CEI) at BASF Corporation (BASF), located at 2525 South Kensington Road, Kankakee, Illinois. The Purpose of the CEI was to evaluate BASF's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA), specifically; those regulations related to the management and disposal of hazardous waste and used oil.

Photographs (photos) taken during the inspection are attached (Attachment 1).

History and Interview

I arrived at BASF on August 28, 2014 at approximately 9:25 a.m., and entered the property. The following individuals were present during the CEI:

NAME	TITLE	EMPLOYER
Gracie Scambiaterra	Environmental Scientist	U.S. EPA
¹ James Emch	EHS Team Lead	BASF
Julie DiGiannantonio	EHS Specialist III	BASF
Steve Hull	EHS Specialist III	BASF
Judy Brinkman	Site Director	BASF

Mr. Emch and Ms. DiGiannantonio escorted me to their office where I held an opening conference. Mr. Hull and Ms. Brinkman joined us during the opening conference. I explained to them the purpose for being at the facility; and that I would be performing a records review and a physical site inspection of the facility, including taking photos. Our discussion included confidential business information (CBI). I informed the BASF representatives that if they or any other BASF employees were going to disclose CBI, I should be informed immediately in order for me to handle that material and/or information in accordance with EPA policy.

While Ms. DiGiannantonio gathered the records I requested, Mr. Emch, Ms. Brinkman and Mr. Hull provided a brief history of the facility. BASF manufactures industrial specialty chemicals and additives for individual companies that would require them as an ingredient in their products. The manufacturing processes are separated into three separate businesses at this location. These businesses include: chemical dispersions such as adhesives and paints (ED); care chemicals for the beauty and agricultural industry (EM); and nutrition and health products for the food industry (EN).

BASF has been operating at this location since approximately November 2011, when they purchased the facility from Cognis Corporation. They have approximately 250 employees at this location and operate 24/7 with three shifts.

¹ Mr. Emch requested to have the final CEI report and correspondence sent to his attention.

According to the RCRAInfo database, BASF submitted a biennial report, on or about 3/1/2014, for its 2013 calendar year generator activities and notified that it was operating as a large quantity generator of hazardous waste. Prior to this date, BASF had submitted notifications to the Illinois Environmental Protection Agency (Illinois EPA) since on or about 7/6/2011 that indicated BASF was a large quantity generator (LQG) of hazardous waste.

I provided the Small Business Resources Guide to Mr. Emch.

When Ms. DiGiannantonio returned with the records, I explained to her and Mr. Emch that I would be conducting the records review portion first, followed by the physical site inspection.

Records Review

I began the record review at approximately 10:30 a.m.

Contingency Plan

Ms. DiGiannantonio provided me with BASF's plan titled, "Integrated Contingency Plan" for my review. The plan was dated 9/19/2012, and was prepared by Dave Butler, EHS Specialist for BASF.

BASF's plan designates Mike Bilotto as the Primary Emergency Coordinator, and several Alternate Emergency Coordinators. BASF refers to the EC's as Incident Commanders.

Serving as alternate Incident Commanders:

1. Mike Hull
2. Alan Johnston
3. Kenron Stewart
4. Lyn Stua
5. Casey Van Swol
6. Ron Wright

The contingency plan contained an evacuation plan and emergency equipment. However, they did not have arrangements made with local emergency departments. In addition, they did not have a record that BASF had mailed copies to the Kankakee Police and Fire Departments.

According to Mr. Hull, the previous company (Cognis Corp) implemented their contingency plan in 2011. The plan worked accordingly.

Manifests

Mr. Hull provided me the last three years (2011-2013) of hazardous waste manifests. I reviewed them and noted that BASF sent waste off-site for shipment approximately every month. The last hazardous waste manifest from calendar year 2013 is recorded below:

Hazardous Waste Manifests				
Manifest Number	Waste Code(s)	Quantity	Date	TSDf Signature?/ Signatory/Sent to
012154810 JJK	D001, F003, F005	1885 gal	12/23/13	Yes

The following TSDf is where above waste was sent to:

1. Tradebe: IND000646943.
2. EQ Detroit: MID980991566.

Steve Hull, Maureen Haller signed for all the hazardous waste manifest I reviewed.

Annual Reports

Hazardous Waste Annual Report				
Calendar Year:	2013	Date Signed:	2/18/14	
Certified Mail Receipt: Unknown				
Treatment, Storage, and Disposal Facilities Used:				
TSDF			KYD985073196	
TSDF			IND000646943	

Hazardous Waste Annual Report				
Calendar Year:	2012	Date Signed:	2/19/13	
Certified Mail Receipt: Unknown				
Treatment, Storage, and Disposal Facilities Used:				
TSDF			KYD985073196	
TSDF			IND000646943	

Hazardous Waste Annual Report				
Calendar Year:	2011	Date Signed:	2/29/12	
Certified Mail Receipt: Unknown				
Treatment, Storage, and Disposal Facilities Used:				
TSDF			IND000646943	
TSDF			ILD000666206	

Training

Mr. Emch and Ms. DiGiannantonio provided me the training records for BASF employees, specifically for hazardous waste management. The training is provided to BASF employees via computer-based training (CBT) called the Mockingbird Online training system. The records were recorded electronically and were provided for my review via their computer system. I reviewed the following:

1. 2014 dates of in-house CBT training: Site Specific RCRA and Contingency Plan Training (see below). Several dates of training were conducted throughout the 2014 calendar year.
2. 2013 dates of in-house CBT training: Site Specific RCRA and Contingency Plan Training (see below). Several dates of training were conducted throughout 2013 calendar year.
3. 2012 dates of training: Classroom training was conducted by Steven Hull throughout the 2012 calendar year.

I reviewed the training slides titled "BASF Kankakee Site Specific RCRA, RCRA and Universal Waste." I also reviewed a second training titled "Contingency Plan Training." Topics covered include:

1. Waste Minimization
2. 90-day waste pad
3. Preparedness and Prevention
4. LQGs
5. Waste Containers
6. Satellite drums
7. Waste handling
8. Emergency response training
9. Universal Waste

Mr. Hull also provided me, for review, his training certificate titled "Hazardous/Toxic Waste Management Course, 40 CFR 262.34, 40 CFR 265.16." The training was provided by Lion Technology, Inc. on 12/29/2010.

Weekly Inspection Logs

Ms. DiGiannantonio provided for my review weekly inspection records for BASF's inspection of their less than 90-day hazardous waste storage area.

Waste Determinations

Ms. DiGiannantonio provided me the waste determinations for the following waste streams:

1. Spent Filters: D001.
2. Miscellaneous lab solvent waste (titrations):
3. Recovered toluene: F005. Process generating this waste: Area 51 stripping process.

I concluded the records review at approximately 12:35 p.m. at which time the BASF representatives informed me that prior to allowing visitors into the plant area to observe and take photographs, a short safety video is required to be viewed and a safe work permit is required to be completed and signed (*see* Attachment 3 for annotation of the "Kankakee Safe Work Permit" [Document #1]). I watched the BASF's safety video at 12:45 p.m., completed and signed the permit form, and then prepared for the site inspection. I asked for a copy of BASF's site plan to use as reference during the site inspection (*see* Attachment 3 for annotation of the site plan [Document #2]).

Site Inspection

The BASF site inspection began at approximately 1:10 p.m. in Area 51, which is comprised of two floors. Here, amine-based resins are mixed with bisphenol A (BPA) to make formulation material for different types of adhesives. This area had three satellite accumulation areas (SAAs). The first SAA we walked to was on the 2nd floor and held a container of acidic acetonitrile waste (*see* photo 1). The next SAA was on the 1st floor and I observed three containers of hazardous waste retains and filters (*see* photo 2). The third SAA was also on the 1st floor and one container of hazardous waste sample draining was in this area (*see* photo 3).

The next area we walked to was the less than 90-day hazardous waste storage area. There were several containers of hazardous waste in this area. There were six 55-gallon containers of hazardous waste in one row and to the right, an open, box that was lined with black plastic, holding un-punctured cans of spray paint waste (*see* photo 4). The lined box of paint can waste was not marked with the words "Hazardous Waste" and it was not dated. When I asked Mr. Hull about the box and its contents, he told me he wasn't sure why it was not properly marked. He also told me he thought the waste had been accumulating here for about three or four months. I reminded Mr. Hull about the 90-day accumulation requirement for onsite hazardous waste. He responded that it would be handled as soon as possible. Also in this area I noted a 55-gallon container with smaller waste paint containers within (*see* photos 5-6). The 55-gallon container was labeled with the words "Hazardous Waste," however, it was not dated with the accumulation start date. I pointed this out to Mr. Hull.

We continued to walk around the hazardous waste storage area and came upon several more containers. Six 250-gallon containers (totes) were holding hazardous waste generated from off-spec Aliquot 336 material (*see* photo 7). Mr. Hull informed me that they were never able to find a buyer for the material and thus were left to dispose of it as hazardous waste. Nearby, there were thirteen 55-gallon containers of solvent destined for

beneficial reuse at either Buzzi Unicem in Greencastle, Indiana or Green America Recycling, LLC in Hannibal, Missouri (*see* photo 8). I asked the BASF representatives for a copy of the beneficial reuse agreements with both facilities named above and I was provided with them (*see* Attachment 3 for annotation of the beneficial reuse documents [Document #3]).

The next area we inspected was Area 21. Here, vitamin E is made by splitting vegetable oil distillate (VOD). A barisol oil waste is generated from this process and it's been identified as a hazardous waste because it comes in contact with ethylene dichloride in the manufacturing process. We walked over to the SAA and I observed a 55-gallon container of this barisol oil/VOD hazardous waste (*see* photo 9).

Mr. Hull informed me that the remaining part of the facility did not contain, store or generate any other types of hazardous waste. Nonetheless, I asked to see the remaining areas of the facility. We walked around the facility and I did not see any additional hazardous waste areas or hazardous waste containers.

I concluded the BASF physical site inspection at approximately 2:20 p.m., at which time the BASF representatives escorted me back to the office area so I could conduct a closing conference.

Closing Conference

Once we returned to the office area, I sat down with Mr. Emch, Ms. DiGiannantonio, and Mr. Hull. The following topics were discussed:

1. Contingency Plan: we discussed the requirements to describe arrangements made with local emergency departments in the contingency plan and to submit copies of the plan to those local emergency departments.
2. Containers: we discussed the two containers with labeling/markings issues (*see* photos 4-6)

I thanked all the BASF representatives for their time and the documents they provided me. I explained that a thorough review would be completed and a compliance determination would be forthcoming.

I completed the CEI at approximately 3 p.m. and departed the facility.

ATTACHMENTS: (3)

Attachment 1	Photographs taken during the inspection
Attachment 2	Inspection checklist
Attachment 3	List of documents obtained during the CEI

Attachment 1



Photo 1. Photographer: G. Scambiatterra. Time: 1:15 p.m.
Description: SAA on the 2nd floor of Area 51, container of acidic acetonitrile waste

Attachment 1



Photo 2. Photographer: G. Scambiaterra. Time: 1:20 p.m.
Description: SAA was on the 1st floor in Area 51, three containers of hazardous waste.
Left container: sample retains. Middle container: spent polyamide filters.
Right container: spent versamine filters.

Attachment 1



Photo 3. Photographer: G. Scambiaterra. Time: 1:20 p.m.
Description: SAA was also on the 1st floor and of Area 51, hazardous waste sample draining (liquid).

Attachment 1



Photo 4. Photographer: G. Scambiaterra. Time: 1:27 p.m.
Description: six 55-gallon containers of hazardous waste in one row and to the right, box lined with black plastic, holding un-punctured cans of spray paint waste

Attachment 1



Photo 5. Photographer: G. Scambiaterra. Time: 1:32 p.m.
Description: 90-day Hazardous Waste Storage Area: 55-gallon container with smaller
waste paint containers within

Attachment 1



Photo 6. Photographer: G. Scambiaterra. Time: 1:32 p.m.
Description: 90-day Hazardous Waste Storage Area: 55-gallon container with smaller waste paint containers within

Attachment 1



Photo 7. Photographer: G. Scambiaterra. Time: 1:43 p.m.
Description: Six 250-gallon containers (totes) holding hazardous waste generated from off-spec Aliquot 336 material.

Attachment 1



Photo 8. Photographer: G. Scambiaterra. Time: 1:46 p.m.
Description: Thirteen 55-gallon containers of solvent destined for beneficial reuse at either Buzzi Unicem in Greencastle, Indiana or Green America Recycling, LLC in Hannibal, Missouri.

Attachment 1



Photo 9. Photographer: G. Scambiaterra. Time: 1:52 p.m.
Description: SAA at Area 21, 55-gallon container of barisol oil/VOD hazardous waste.

Installation Name:
BASF Corporation
Date of Inspection:
August 28, 2014

Location Address:
2525 S. Kensington Rd
U.S. EPA Inspector:
Graciela Scambiaterra

EPA ID Number:
ILD 005 215 769

Attachment 2

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (>1000 KG/MO.)	
	SUBPART A: GENERAL	
	Section 722.111 Hazardous Waste Determination	
722.111	Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.111
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	Section 722.112 USEPA Identification Numbers	
722.112(a)	Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	808.121(a) 722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(c)
	SUBPART B: THE MANIFEST	
	Section 722.120 General Requirements	
722.120(a)	Does the facility manifest its waste off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(a)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(b)
	Section 722.121 Acquisition of Manifests	
722.121(a)	Has the generator used: - an Illinois manifest for wastes designated to a facility within Illinois? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(d) 722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(b)
	Section 722.122 Number of Copies	
722.122	Does the manifest consist of at least 6 copies? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.122
	Section 722.123 Use of the Manifest	
722.123(a)	For each manifest reviewed, has the generator: - signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - retained one copy as required by Section 722.140(a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(a)
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(b)

Installation Name:
BASF Corporation
Date of Inspection:
August 28, 2014

Location Address:
2525 S. Kensington Rd
U.S. EPA Inspector:
Graciela Scambiatterra

EPA ID Number:
ILD 005 215 769

Attachment 2

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.123(c)	- has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.123(c)
722.130	SUBPART C: PRE-TRANSPORT REQUIREMENTS Is there any hazardous waste ready for transport off-site? Yes <input checked="" type="checkbox"/> No _____ N/A _____ If so, is the generator complying with the pre-transport requirements in Subpart C? Yes _____ No <input checked="" type="checkbox"/> N/A _____	722.130
(722.134(a))	Section 722.134 Accumulation Time Has the generator complied with the following requirements: Yes _____ No _____ N/A _____	
(722.134(a)(1))	A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, BB, and CC? Yes <input checked="" type="checkbox"/> No _____ N/A _____ and/or B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC (except Sections 725.297(c) and 725.300)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> and/or C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection? Yes _____ No _____ N/A <input checked="" type="checkbox"/> and/or D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(722.134(a)(2))	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes _____ No <input checked="" type="checkbox"/> N/A _____	See report
(722.134(a)(3))	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes _____ No <input checked="" type="checkbox"/> N/A _____	See report
(722.134(a)(4))	Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)? Yes _____ No <input checked="" type="checkbox"/> N/A _____ Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows: Does the facility accumulate hazardous waste in containers? Yes <input checked="" type="checkbox"/> No _____ N/A _____ If "No", go to Subpart J.	See report + Subpart D
(725.211) (725.214)	SUBPART I: USE AND MANAGEMENT OF CONTAINERS Has the generator closed an accumulation area? Yes _____ No <input checked="" type="checkbox"/> N/A _____ If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	725.211 725.214

Installation Name:
BASF Corporation
Date of Inspection:
August 28, 2014

Location Address:
2525 S. Kensington Rd
U.S. EPA Inspector:
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EPA ID Number:
ILD 005 215 769

Attachment 2

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes _____ No _____ N/A <u>✓</u>	
(725.272)	Is the waste compatible with the container and/or liner? Yes <u>✓</u> No _____ N/A _____	
(725.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes <u>✓</u> No _____ N/A _____	
(725.273(b))	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes <u>✓</u> No _____ N/A _____	
(725.274)	Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes <u>✓</u> No _____ N/A _____ Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes <u>✓</u> No _____ N/A _____	
(725.276)	Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? Yes <u>✓</u> No _____ N/A _____ Note: See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.	
(725.277)	Is the owner/operator complying with the requirements concerning incompatible wastes? Yes _____ No _____ N/A <u>✓</u> COMMENTS:	
(725.278)	Section 725.278 Air Emission Standards Is the owner or operator managing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725? Yes _____ No _____ N/A <u>✓</u> Comments: Does the generator accumulate and/or treat hazardous waste in tanks? Yes _____ No _____ N/A <u>✓</u> Note: If "No", go to Subpart C.	
(725.211) (725.214)	SUBPART J: TANK SYSTEMS Has the generator closed an accumulation area? Yes _____ No _____ N/A <u>✓</u> If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes _____ No _____ N/A <u>✓</u>	725.211
		725.214

Installation Name:
BASF Corporation
Date of Inspection:
August 28, 2014

Location Address:
2525 S. Kensington Rd
U.S. EPA Inspector:
Graciela Scambiaterra

EPA ID Number:
ILD 005 215 769

Attachment 2

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.290)	<p>Does the facility accumulate or treat hazardous waste in tanks? Yes _____ No _____ N/A <u>✓</u></p> <p>Note: A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit. If "No", skip Subpart J.</p> <p>a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293.</p> <p>b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a).</p> <p>c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.</p>	
(725.291(a))	<p>For tanks existing prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes _____ No _____ N/A <u>✓</u></p>	
(725.291(b))	<p>Does this assessment consider at least the following:</p> <p>1) design standards for the tank and ancillary equipment? Yes _____ No _____ N/A <u>✓</u></p> <p>2) hazardous characteristics of the wastes? Yes _____ No _____ N/A <u>✓</u></p> <p>3) existing corrosion protection measures? Yes _____ No _____ N/A <u>✓</u></p> <p>4) documented age of the tank system? Yes _____ No _____ N/A <u>✓</u></p> <p>5) results of a leak test, internal inspection, or other tank integrity examination? Yes _____ No _____ N/A <u>✓</u></p> <p>*IRPE = Independent Registered Professional Engineer</p>	
(725.291(c))	<p>Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes _____ No _____ N/A <u>✓</u></p> <p>Note: If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).</p>	

Installation Name:
BASF Corporation
Date of Inspection:
August 28, 2014

Location Address:
2525 S. Kensington Rd
U.S. EPA Inspector:
Graciela Scambiaterra

EPA ID Number:
ILD 005 215 769

Attachment 2

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.292(a))	<p>For new tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Does the assessment include, at a minimum, the following:</p> <ol style="list-style-type: none"> 1) design standards for tanks and ancillary equipment? Yes _____ No _____ N/A <input checked="" type="checkbox"/> 2) hazardous characteristics of the waste(s) to be handled? Yes _____ No _____ N/A <input checked="" type="checkbox"/> 3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes _____ No _____ N/A <input checked="" type="checkbox"/> 4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes _____ No _____ N/A <input checked="" type="checkbox"/> 5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave? Yes _____ No _____ N/A <input checked="" type="checkbox"/> 	
(725.292(g))	<p>Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.293(a))	<p>Is secondary containment provided for any new tank system before being put into service? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>or if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.293(b))	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	

Installation Name:
BASF Corporation
Date of Inspection:
August 28, 2014

Location Address:
2525 S. Kensington Rd
U.S. EPA Inspector:
Graciela Scambiatterra

EPA ID Number:
ILD 005 215 769

Attachment 2

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(e))	<p>To meet the requirements of Subsection (b), is the secondary containment system:</p> <p>1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression or uplift? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>and is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Note: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>	
(725.293(d))	<p>Does the secondary containment for tanks have one or more of the following:</p> <p>1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.293(e))	<p>Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.293(f))	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>If "No":</p> <p>1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>2) Are welded flanges, joints and connections inspected daily? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>3) Are sealless or magnetic coupling pumps and sealless valves inspected daily? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.293(i))	<p>Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p> <p>1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Note: If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.</p>	

Installation Name:
BASF Corporation
Date of Inspection:
August 28, 2014

Location Address:
2525 S. Kensington Rd
U.S. EPA Inspector:
Graciela Scambiaterra

EPA ID Number:
ILD 005 215 769

Attachment 2

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.294(a))	Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.294(b))	Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including: 1) spill prevention controls? Yes _____ No _____ N/A <input checked="" type="checkbox"/> 2) overflow prevention controls? Yes _____ No _____ N/A <input checked="" type="checkbox"/> 3) sufficient freeboard in uncovered tanks? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.294(c))	Note: If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.	
(725.295(a))	Does the owner/operator inspect, if present, at least each operating day, the following: 1) overflow/spill control equipment? Yes _____ No _____ N/A <input checked="" type="checkbox"/> 2) the aboveground portion of the tank system for corrosion or releases? Yes _____ No _____ N/A <input checked="" type="checkbox"/> 3) data from monitoring equipment? Yes _____ No _____ N/A <input checked="" type="checkbox"/> 4) the construction materials and the area immediately surrounding the external portion of the system? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.295(b))	If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.295(c))	Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.296)	If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator: a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes _____ No _____ N/A <input checked="" type="checkbox"/> b) removed applicable waste from the system within 24 hours of detection? Yes _____ No _____ N/A <input checked="" type="checkbox"/> c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.296(d))	d) notified the Agency within 24 hours of detection of release? Yes _____ No _____ N/A <input checked="" type="checkbox"/> d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Note: Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.	

Installation Name:
BASF Corporation
Date of Inspection:
August 28, 2014

Location Address:
2525 S. Kensington Rd
U.S. EPA Inspector:
Graciela Scambiatterra

EPA ID Number:
ILD 005 215 769

Attachment 2

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.296(e))	<p>e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes _____ No _____ N/A <u>✓</u></p> <p>e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? Yes _____ No _____ N/A <u>✓</u></p> <p>e)4) met the requirements for a new tank system in the event that a component is replaced during repair? Yes _____ No _____ N/A <u>✓</u></p> <p>e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? Yes _____ No _____ N/A <u>✓</u></p>	
(725.296(f))	<p>f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system? Yes _____ No _____ N/A <u>✓</u></p> <p>Note: If the owner/operator does not satisfy the requirements of subsections (e)(2) through (c)(4), the tank system must be closed in accordance with Section 725.297.</p>	
(725.297(a))	<p>At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]? Yes _____ No _____ N/A <u>✓</u></p>	
(725.297(a))	<p>Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes _____ No _____ N/A <u>✓</u></p>	
(725.297(b))	<p>If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)? Yes _____ No _____ N/A <u>✓</u></p> <p>Note: Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.</p>	
(725.298(a))	<p>Are ignitable or reactive wastes placed in a tank system? Yes _____ No _____ N/A <u>✓</u></p> <p>If "No", skip to Section 725.299.</p> <p>Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that:</p> <ul style="list-style-type: none"> - the resulting waste, mixture or dissolved material is no longer ignitable or reactive? Yes _____ No _____ N/A <u>✓</u> - Section 725.117(b) is complied with? Yes _____ No _____ N/A <u>✓</u> <p>or</p> <p>Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction? Yes _____ No _____ N/A <u>✓</u></p> <p>or</p> <p>Is the tank used solely for emergencies? Yes _____ No _____ N/A <u>✓</u></p>	

Installation Name:
BASF Corporation
Date of Inspection:
August 28, 2014

Location Address:
2525 S. Kensington Rd
U.S. EPA Inspector:
Graciela Scambiaterra

EPA ID Number:
ILD 005 215 769

Attachment 2

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.298(b))	Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.299)	Are incompatible wastes/materials placed in the same tank? Yes _____ No _____ N/A <input checked="" type="checkbox"/> If "No", skip to Section 725.300. Is Section 725.117(b) being complied with? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with? Yes _____ No _____ N/A <input checked="" type="checkbox"/> COMMENTS:	
(725.302)	Section 725.302 Air Emission Standards Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Comments:	
(725.131)	SUBPART C: PREPAREDNESS AND PREVENTION Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No _____ N/A _____ b) a telephone or other device to summon emergency assistance from local authorities? Yes <input checked="" type="checkbox"/> No _____ N/A _____ c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No _____ N/A _____ d) water at adequate volume and pressure for fire control? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes <input checked="" type="checkbox"/> No _____ N/A _____ b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.135)	Is the facility maintaining adequate aisle space? Yes <input checked="" type="checkbox"/> No _____ N/A _____	

Installation Name:
BASF Corporation
Date of Inspection:
August 28, 2014

Location Address:
2525 S. Kensington Rd
U.S. EPA Inspector:
Graciela Scambiaterra

EPA ID Number:
ILD 005 215 769

Attachment 2

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.137)	<p>Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste:</p> <ul style="list-style-type: none"> - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes _____ No _____ N/A _____ - agreements designating the primary authority where more than one police or fire department might respond? Yes _____ No _____ N/A _____ - agreements with State emergency response teams, contractors and equipment suppliers? Yes _____ No _____ N/A _____ - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes _____ No _____ N/A _____ 	
	SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES	
(725.151(a))	<p>Is the contingency plan available? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>If "No", skip to Section 725.155.</p> <p>Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	
(725.151(b))	<p>Has there been a fire, explosion or release of hazardous waste? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>If "Yes", has the contingency plan been carried out immediately? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.152(a))	<p>Does the plan describe the actions required for response to:</p> <ul style="list-style-type: none"> - fires? Yes <input checked="" type="checkbox"/> No _____ N/A _____ - explosions? Yes <input checked="" type="checkbox"/> No _____ N/A _____ - releases? Yes <input checked="" type="checkbox"/> No _____ N/A _____ 	
(725.152(c))	<p>Does the plan describe arrangements with:</p> <ul style="list-style-type: none"> - police and fire departments? Yes _____ No <input checked="" type="checkbox"/> N/A _____ - hospitals? Yes _____ No <input checked="" type="checkbox"/> N/A _____ - contractors? Yes _____ No <input checked="" type="checkbox"/> N/A _____ - emergency response teams? Yes _____ No <input checked="" type="checkbox"/> N/A _____ 	See report
(725.152(d))	<p>Does the plan contain the current emergency coordinator's name, phone (office and home) and address? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	
(725.152(e))	<p>Does the plan identify all emergency equipment including:</p> <ul style="list-style-type: none"> - description? Yes <input checked="" type="checkbox"/> No _____ N/A _____ - capability? Yes <input checked="" type="checkbox"/> No _____ N/A _____ - location? Yes <input checked="" type="checkbox"/> No _____ N/A _____ <p>Is the list of emergency equipment up-to-date? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	
(725.152(f))	<p>Does the plan include:</p> <ul style="list-style-type: none"> - an evacuation plan? Yes <input checked="" type="checkbox"/> No _____ N/A _____ - an evacuation signal? Yes <input checked="" type="checkbox"/> No _____ N/A _____ - alternate evacuation routes? Yes <input checked="" type="checkbox"/> No _____ N/A _____ 	

Installation Name:
BASF Corporation
Date of Inspection:
August 28, 2014

Location Address:
2525 S. Kensington Rd
U.S. EPA Inspector:
Graciela Scambiatterra

EPA ID Number:
ILD 005 215 769

Attachment 2

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.153)	<p>Has the contingency plan (including all revisions) been:</p> <p>a) maintained at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>b) submitted to:</p> <p>- police department? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>- fire department? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>- hospital? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>- emergency response teams? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p>	See report
(725.154)	<p>Has the contingency plan been reviewed and revised whenever:</p> <p>a) regulations are revised? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>b) the plan fails in an emergency? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <i>BES</i></p> <p>c) the facility changes in a way that modifies the emergency response necessary? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>d) information regarding emergency coordinators changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>e) information regarding equipment changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.155)	<p>Is the emergency coordinator on-site or on call at all times? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.156)	<p>If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Note: If the facility has had a release, explain in detail.</p>	

Installation Name:
BASF Corporation
Date of Inspection:
August 28, 2014

Location Address:
2525 S. Kensington Rd
U.S. EPA Inspector:
Graciela Scambiaterra

EPA ID Number:
ILD 005 215 769

Attachment 2

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.116(a))	<p>Section 725.116 Personnel Training</p> <p>Does the facility have a training program? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the program directed by a person trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program cover, at a minimum:</p> <ul style="list-style-type: none"> - procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - key parameters for automatic waste feed cut-off systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - communications or alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - response to fire or explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - response to groundwater contamination incidents? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - shutdown of operations? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.116(b))	<p>Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(c))	<p>Have facility personnel received an annual review of the initial training? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(d))	<p>Are the following documents and records being maintained at the facility:</p> <ol style="list-style-type: none"> 1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.116(e))	<p>Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	

Installation Name:
BASF Corporation
Date of Inspection:
August 28, 2014

Location Address:
2525 S. Kensington Rd
U.S. EPA Inspector:
Graciela Scambiaterra

EPA ID Number:
ILD 005 215 769

Attachment 2

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(728.107(a)(5))	Section 728.107 Waste Analysis and Recordkeeping Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Is the plan on-site? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Does the plan include a detailed physical and chemical analysis? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
722.134(c)	Section 722.134 Satellite Accumulation Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words identifying the contents? Yes <input checked="" type="checkbox"/> No _____ N/A _____ Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes <input checked="" type="checkbox"/> No _____ N/A _____ If there are more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes <input checked="" type="checkbox"/> No _____ N/A _____ During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
722.134(g)	Note: A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled.	
	SUBPART D: RECORDKEEPING AND REPORTING Section 722.140 Recordkeeping	
722.140(a)	Has the generator retained for a period of 3 years: - a copy of each signed manifest? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(a)
722.140(b)	Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(b)
722.140(c)	Has the generator retained for a period of 3 years: - copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(c)
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.140(d)

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(a)	Section 722.141 Annual Reporting Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Note: If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.	722.141(a)
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.141(b)
722.142(a)(1)	Section 722.142 Exception Reporting If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.142(a)(1)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.142(a)(2)
722.143	Section 722.143 Additional Reporting Has the generator furnished additional reports as required by the Director? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.143
722.150	SUBPART E: EXPORTS OF HAZARDOUS WASTE Is the generator an exporter of hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart E? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.150
722.160	SUBPART F: IMPORTS OF HAZARDOUS WASTE Is the generator an importer of hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart F? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.160
722.170	SUBPART G: FARMERS Is the generator a farmer? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart G? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.170

ATTACHMENT 3

Document List

Documents received during the inspection:

Document #	Description	Claimed as CBI
1	Kankakee Safe Work Permit (1 page)	No
2	Site Plan (1 page)	No
3	Beneficial Reuse Documents (12 pages)	No

